## EXHIBIT A

## TO THE DECLARATION OF STEVE W. BERMAN IN OPPOSITION TO MOTION TO COMPEL "PROPER ANSWERS" TO BMS' CONTENTION INTERROGATORIES

## Case 1:01-cv-12257-PBS Document 923-3 Filed 07/15/04 Page 2 of 50

**EXHIBIT A** 

DEFENDANTS' THIRD-PARTY SUBPOENAS TO CLASS MEMBERS

Served Objections	yes																										ì
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Business of Target	Health Insurer/HMO																										
Target Company.	AARP Health Care	Options	601 E Street, N.W.	Washington, D.C.	20049		Jason H. Ehrenberg,	Esq.	Michael Prame	The Groom Law Group	1701 Pennsylvania	Ave. NW	Washington, D.C.	20006													

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Targer Compan												Advantra	6705 Rockledge Drive,	Suite 900	Bethesda, MD 20817			Thomas Zielinski, Esq.	Sr. VP & Gen. Counsel	Advantra									
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Business of Target			Health Insurer/HMO	(specializes in public sector programs,	including Medicaid,	Medicare and	CHIPs)																
Larget Company	Allscripts, Inc. 2401 Commerce Ave. Libertyville, IL 60048-	<b>1</b> 011	AmeriChoice Health	Services, Inc. 8045 Leesburg Pike, 6 <sup>th</sup>	Floor	Vienna, VA 22182	i	Thomas F. Fitzgerald	Michael J. Prame	Lars C. Golumbic, Esq.	The Groom Law Group	1/01 Pennsylvania	Myschington D.C.	washington, D.C.	70000								

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	Blue Cross & Blue Shield of Florida, Inc. P.O. Box 1798	Jacksonville, FL 33231-0014		Blue Cross & Blue Shield of Kansas	2301 Main Street	Kansas City, MO	64108		Blue Cross & Blue	Shield of Montana	560 N. Park Avenue	Helena, MT 59601			Blue Cross & Blue	Shield of Nebraska	7261 Mercy Rd.	Omaha, NE 68180			Bling Cross & Bling	Shield of Tennessee

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Business of Targer			Health Insurer/HMO
Table Company	801 Pine Street Chattanooga, TN 37402-2555	Care America Health Plans 6300 Canoga Ave. Woodland Hills, CA 91367 Greg Pimstone, Esq. Manatt, Phelps & Phillips 11355 W. Olympic Blvd Los Angeles, CA 90064	CIGNA Healthcare 1601 Chestnut Street One Liberty Place Philadelphia, PA 19192 Reter St. Phillips, Esq. Lowey Dannenberg Bemporad & Selinger, P.C. 1 North Lexington Ave. 11 Floor

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	2896	Connecticut General Life Ins. Co. Eric W. Sitarchuk Sally M. Williams Ballard Spahr Andrews & Ingersoll, LLP 1735 Market Street 51st Floor Philadelphia, PA 19103-7599 P: (215) 864-8220	Coventry Health Care, Inc. 6705 Rockledge Drive Bethesda, MD 20817 Thomas Zielinski, Esq. Sr. VP & Gen. Counsel Coventry Healthcare, Inc. 2751 Centerville Rd. Suite 400 Wilmington, DE 19808	CPIC Life 50 Beale Street

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A STREET COMPANY	San Francisco, CA 94105-1808		Greg Pimstone, Esq.	Manatt, Phelps &	Phillips	11355 W. Olympic	Blvd	Los Angeles, CA	90064																			

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Target Company				Eckered Health	Services	620 Epsilon Drive	Pittsburgh, PA 15238				Empire Blue Cross &	Blue Shield	15 Metroctech Center	Brooklyn, NY 11201		Louis Benza, Esq.	Empire Blue Cross	First Health	3200 Highland Avenue	Downers Grove, IL	60516				First Health Services	Corporation

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Business of Larget		Health Insurer/HMO								
Large Company	4300 Cox Road Glen Allen, VA 23060	Gateway Health Plan U.S. Steel Tower 41 600 Grant Street Pittsburgh, PA 15219	Jerry R. Hogenmiller Thomson, Rhodes &	Cowie, P.C. Two Chatham Ctr., 10 <sup>th</sup>	Floor Pittsburgh, PA 15219-	3499 P: (412) 316-8689	F: (412) 232-3498 JH@TRC-LAW.com			

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	3121 TecPort Drive P.O. Box 67103 Harrisburg, PA 17106	Thomas Zielinski, Esq. Sr. VP & Gen. Counsel	Health America/ Health Assurance	2751 Centerville Rd. Suite 400	Wilm	Health Net, Inc. 21281 Burbank Blvd.	Woodland Hills, CA 91367	0 1 2	roveit Staughter, Esq. Lewis Brisbois,	Bisgaard & Smith 221 N. Figueroa St.,	Suite 1200	Los Angeles, CA 90012	Healthcare Service	300 E. Randolph Street	Chicago, IL 60601		
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Larger Company	Highmark Life and	Casualty Group	Pittsburgh, PA 15222		Peter St. Phillips, Esq.	Lowey Dannenberg	Bemporad & Selinger,	P.C.	1 North Lexington Ave.	11 Floor	White Plains, NY	10601-1714																	

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Humana, Inc. 500 W. Main St. Louisville, KY 40201- 1438	Bradley Wood, Esq. Humana Inc. Richard W. Cohen Peter D. St. Phillips, Jr. Lowey Dannenberg Bemporad & Selinger,	F.C. The Gateway – 11 <sup>th</sup> Fl. One Lexington Avenue White Plains, NY 10601 P: (914) 997-0500	Independent Health 511 Farber Lakes Drive Buffalo, NY 14221 Melinda Rieske, Esq. Independent Health

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High arget Company		Intracorp 1601 Chestnut Street Two Liberty Place Philadelphia, PA 19192 Barbara Billman Intracorp Eric W. Sitarchuk Sally M. Williams Ballard Spahr Andrews & Ingersoll, LLP 1735 Market Street 51st Floor Philadelphia, PA

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Defense Counsel Served		Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036	Erik Haas, Patterson, Belknap, Webb & Tyler; Astra, BSM, GSK, Immunex, Centocor
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Company of the second of the s		Kaiser Foundation Hospitals: The Prentice-Hall Corp. System One Kaiser Plaza 25 <sup>th</sup> Floor Oakland, CA 94612 Robert Rhoad, Esq. Porter, Wright, Morris & Arthur 1919 Pennsylvania Ave. N.W. Suite 500 Washington, D.C.	Kaiser Permanente One Kaiser Plaza 25th Floor Oakland, CA 94612 Robert Rhoad, Esq. Porter, Wright, Morris & Arthur 1919 Pennsylvania

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Business of Target				Claims Processor and other software solutions
Target Company	Liberty National Ins. Co. 2001 Third Ave. S. Birmingham, AL 35233	Louisiana Health Service & Indennity Co., Inc. 5525 Reitz Avenue Baton Rouge, LA 70898-9029	MedImpact Healthcare Systems, Inc. 10680 Treena Street, 5 <sup>th</sup> Floor San Diego, CA 92131	MedPlus 300 Oxford Drive Monroeville, PA 15146-2343 Curtis Krasik, Esq. Kirkpatrick & Lockhart, LLP Henry W. Oliver Bldg.

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	New York Life Insurance Company 51 Madison Avenue New York, NY 10010 Donna Alstram, Esq.

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Fersings (Company)	Trumbull, CT 0661		Peter St. Phillips, Esq.	Lowey Dannenberg	Bemporad & Selinger,	P.C.	1 North Lexington Ave.	11 Floor	White Plains, NY	10601-1714																				

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Farget Company								The Regence Group	200 Southwest Market	St.	Portland, OR 97201		Lisa Heinichen, Esq.	Regence Group													

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Defense Counsel Defendant(s)		Erik Haas Patterson Belknap Webb & Tyler 1133 Avenue of the Americas	New York, NY 10036 Erik Haas, Patterson, Belknap, Webb & Tyler;	ASITA, BOM, GOK,
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